

### REMARKS

Claims 1 and 8-12 were rejected under 35 U.S.C. § 102(b) as being anticipated by Ollivier *et al.* (U.S. Patent No. 6,385,492, "Ollivier"). Claims 3-4 were rejected under 35 U.S.C. § 103(a) as being rendered obvious in view of Ollivier.

#### I. 35 U.S.C. § 102(b) Rejection

Claims 1 and 8-12 were rejected under 35 U.S.C. § 102(b) as being anticipated by Ollivier. Applicants respectfully traverse the grounds for this rejection.

"[A] claim is anticipated if each and every limitation is found either expressly or inherently in a single prior art reference." *Celeritas Techs., Ltd. v. Rockwell Int'l. Corp.*, 150 F.3d 1354, 1361, 47 U.S.P.Q.2d 1516, 1522 (Fed. Cir. 1998). The standard for lack of novelty, that is, for "anticipation," is one of strict identity. *Trintec Indus., Inc. v. Top-U.S.A. Corp.*, 295 F.3d 1292, 1296, 63 U.S.P.Q.2d 1597, 1600 (Fed. Cir. 2002).

Claim 1 has been amended to include, among other things, that the "at least one relief formed on the cylindrical body, said relief having an overall helicoid contour and a continuous thread of variable radius extending around and for a length along the cylindrical body," Ollivier does not disclose or suggest a coronary probe head having either a helicoid contour or a continuous thread extending around the cylindrical body for a length along the body, with dimensions as required by claim 1 of the present invention. Instead, Ollivier shows, in Figs. 11-14, various specialized probe heads having specific structures as shown in the figures. Although the Examiner points to Fig. 12 of Ollivier as having a thread, the Examiner concedes in the Action (page 4) that Ollivier does not teach or suggest a continuous thread that extends around the body for a length along the body. Indeed, none of the structures disclosed in Ollivier teach or

suggest a probe having a relief with a helicoid contour and continuous threading of variable radius as taught in amended claim 1. As stated above, without either an express or inherent disclosure of this claimed functionality Ollivier cannot be anticipating prior art under 35 U.S.C. § 102.

For these reasons, the Applicants respectfully ask that the Examiner withdraw his rejections of claim 1, as amended, and remaining dependent claims 3, 4, and 8-12 which depend from claim 1 and are allowable for at least the same reasons that claim 1 is allowable.

### **CONCLUSION**

Entry of the foregoing amendment, which is deemed to place this application in condition for allowance, and reconsideration of this application in view of the foregoing amendment and remarks respectfully is requested.

The Examiner is invited to call applicants' undersigned attorney if doing so would expedite prosecution.

Date: January 28, 2008

Respectfully submitted,



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